



2030 Dow Center
August 6, 1996

The Dow Chemical Company
Midland, Michigan 48674

Damaris Cristiano
Assistant Regional Counsel
U.S. EPA - Region II
290 Broadway
17th Floor
New York, NY 10278

**SUPPLEMENTAL RESPONSE TO CERLCA 104(e) REQUEST - SCIENTIFIC
CHEMICAL PROCESSING SITE, CARLSTADT, NJ.**

Dear Mr. Cristiano:

The purpose of this letter is two-fold. First, this letter will serve to supplement The Dow Chemical Company's ("Dow's") responses to EPA's January 5, 1995 request for information regarding the above captioned site. Dow initially responded to EPA's request on March 9, 1995 and supplemented this production again on June 6, 1995. We have recently located additional documents that reflect product sales from Dow's former Dow Industrial Services Division facility located in Mt. Holly, New Jersey to Scientific Chemical Treatment Company ("SCTC") in 1966 and 1967. These documents are attached to this letter as Exhibit A and summarized below:

Date	Product Description	Quantity (lbs)	Quantity (gal) ¹
3/30/66	Contaminated CHLORETHENE™	38,920	3114
5/19/66	Crude methylene chloride	4521	362
5/19/66	Crude trichloroethylene	8616	689
6/9/66	Materials	64,375 ²	5155
1/18/67	Crude methylene chloride	3076	<u>246</u>

Dow has made a diligent search of all records in its possession, as well as in the possession of all relevant divisions, subsidiaries and affiliates. In addition, Dow has conducted interviews of relevant current and former employees to determine what, if any, connection Dow may have to the Site. The information Dow has submitted to date reflects the results of this thorough investigation..

¹ Assumes 12.5 pounds per gallon

™ Trademark of The Dow Chemical Company

² Assumes price per gallon of Material equivalent to average price per gallon reflected in other transactions, or approximately \$.028 / gallon.



Secondly, this letter is to notify EPA that Dow is interested in possibly participating in the currently contemplated de minimis settlement. Based on our investigation, the documents submitted to date in response to EPA's 104(e) request indicate a potential Dow volume connected with the SCP - Carlstadt, NJ Site of approximately 47, 207 gallons. The underlying transactions breakdown as follows:

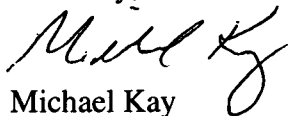
<u>Dow Facility</u>	<u>Material Description</u>	<u>Total Volume</u>	<u>Comments</u>
Carteret, NJ Antifreeze Packaging Operations	waste water (11 trans.)	0	<u>See</u> Dow 3/5/95 104(e) response; documents and attached Affidavit of Thomas Evans (Exhibit B) indicate that these materials were shipped to SCP's Newark, NJ facility, <i>not</i> Carlstadt.
Dow Industrial Services Division - Mt. Holly, NJ	spent hydrochloric acid solution (8 trans.)	38,796	<u>See</u> Dow 6/6/95 104(e) response
Dow Industrial Services Division - Mt. Holly, NJ	chlorinated solvent product sales (4 trans.)	4411	<u>See</u> attached
Dow Industrial Services Division - Mt. Holly, NJ	"material" sale (1 trans.)	0	<u>See</u> attached; there is no evidence that "materials" were wastes or contained any "hazardous substance"
	Total:	43,207 gallons	

50/50
Newark

This total volume is consistent with the amount Dow previously reported to the SCP/Carlstadt Cooperating PRP Group.

If you have any questions or concerns, please feel free to call me.

Sincerely,



Michael Kay
(517) 636-7872

cc: Elizabeth Yu, Esq., Env. Enforcement, US DOJ, P.O. Box 7611, Ben Franklin
Station, Washington D.C. 20044

Richard Puvogal, Esq., US EPA Region II, 290 Broadway, 19th Floor, New York, NY
10007

Sara Beth Watson, Steptoe & Johnson, LLP, 1330 Connecticut Ave., N.W.,
Washington D.C. 20036-1795 (cover letter only)

Exhibit A

**DOW INDUSTRIAL SERVICE**DIVISION OF THE DOW CHEMICAL COMPANY
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114**INDUSTRIAL SERVICE ORDER AND RECEIPT**TERMS: 30 DAYS NET
ADD LEGAL INTEREST THEREAFTER

AREA #2 ALTO

SERVICE AND
INVOICE NO.

DATE

1/18/67

CUSTOMER ORDER NO.

N-5153

STATION LOCATION

MT. HOLLY, N. J.

INDUSTRIAL CODE

602

31-13-516

320 PATERSON PL. RD.

CARLSTADT

NEW JERSEY

DOW INDUSTRIAL SERVICE TO FURNISH MATERIAL AND SERVICE, SUBJECT TO STANDARD TERMS AND CONDITIONS PRINTED ON BACK HEREOF.

SERVICE
INSTRUC-
TIONS

TO: BULK SALE - CRUDE METHYLENE CHLORIDE

CUSTOMER'S
NAME

SCIENTIFIC CHEMICAL TREATMENT CO., INC.

ADDRESS

60 PRINCE STREET

CITY, STATE
and ZIP

ELIZABETH, NEW JERSEY 07207

DOW INDUSTRIAL SERVICE standard terms and conditions
agreed to by
CUSTOMER

CUSTOMER REPRESENTATIVE

TITLE

TIME

SEND ALL REMITTANCES TO: 1579 EAST 21st STREET
TULSA, OKLAHOMA 74114**INVOICE**

OUR INVOICE NUMBER

31-13-516

SEND ALL
REMITTANCES TO
1579 EAST 21st STREE
TULSA, OKLAHOMA 741

DESCRIPTION

AMOUNT

3076 Pounds

CRUDE METHYLENE CHLORIDE

.03

\$ 92.28

3% New Jersey Tax on 92.28

2.77

\$ 95.05

DOW INDUSTRIAL SERVICE

DIVISION OF THE DOW CHEMICAL COMPANY
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114

INDUSTRIAL SERVICE ORDER AND RECEIPT

TERMS: 30 DAYS NET
ADD LEGAL INTEREST THEREAFTER

G.H. BOODMAN

SERVICE AND
INVOICE NO.

DATE

3-30-66

CUSTOMER ORDER NO.

827

STATION LOC.

mt Holly

13

INDUSTRIAL ORDER

602

PLANT ADDRESS

320 Peterson Plank Road

CITY & STATE

La Vista - N.J.

DOW INDUSTRIAL SERVICE TO FURNISH MATERIAL AND SERVICE, SUBJECT TO STANDARD TERMS AND CONDITIONS PRINTED ON BACK HEREOF

SERVICE
INSTRUCTIONS

TO: Bulk Sale - Contaminated Chloroethene

CUSTOMER'S
NAME

Scientific Chemical Treatment Co.

ADDRESS

60 Prince Street

CITY, STATE
and ZIP

Elizabeth, New Jersey 07207

DOW INDUSTRIAL SERVICE standard Terms and Conditions
agreed to by
CUSTOMER

CUSTOMER REPRESENTATIVE

TITLE

NAME

SEND ALL REMITTANCES TO:
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114

INVOICE

SEND ALL
REMITTANCES TO
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114

OUR INVOICE NUMBER

31-13-242

DESCRIPTION

AMOUNT

36,920 lbs Contaminated Chloroethene @ .035

\$ 1,362.20

ORDER NO. **115-2851** DATE **5/15/66** ORDER NO. **825** ORDER NO. **115-2851** ORDER NO. **825** ORDER NO. **115-2851**

TO **10. Bulk Sales & Grade Trichloroethylene** **Condit, N.J.** **29**

FROM **10. Bulk Sales & Grade Trichloroethylene** **Condit, N.J.**

CUSTOMER NAME **10. Bulk Sales & Grade Trichloroethylene** ADDRESS **10. Bulk Sales & Grade Trichloroethylene**

CITY **10. Bulk Sales & Grade Trichloroethylene** STATE **10. Bulk Sales & Grade Trichloroethylene** ZIP **10. Bulk Sales & Grade Trichloroethylene**

INVOICE

SHIPMENT TO
 1515 EAST 21st STREET
 TULSA, OKLAHOMA 74114

QUANTITY	DESCRIPTION	AMOUNT
521 Pounds	Grade Methylene Chloride	.030 \$ 135.63
516 Pounds	Grade Trichloroethylene	.0175 150.78
		\$ 286.41

DOW INDUSTRIAL SERVICE
DIVISION OF THE DOW CHEMICAL COMPANY
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114

INDUSTRIAL SERVICE ORDER AND RECEIPT

TERMS: 30 DAYS NET
ADD LEGAL INTEREST THEREAFTER

Rapp

SERVICE AND
INVOICE NO.
31-14-129

DATE
June 9, 1966

CUSTOMER ORDER NO.
883

STATION LOCATION
Stoneham 31-14

INDUSTRIAL CODE
602

PLANT ADDRESS
320 Paterson Plank Road

CITY & STATE
Carlstadt, N. J.

DOW INDUSTRIAL SERVICE TO FURNISH MATERIAL AND SERVICE, SUBJECT TO STANDARD TERMS AND CONDITIONS PRINTED ON BACK HEREOF.

TO: Bulk Sale

DOW INDUSTRIAL SERVICE Standard Terms and Conditions
agreed to by
CUSTOMER

CUSTOMER REPRESENTATIVE

TITLE

TIME

CUSTOMER'S
NAME

Scientific Chemical Treatment Co., Inc.

ADDRESS

Chemsol Chemical Marketing Division

60 Prince Street

CITY, STATE
and ZIP

Elizabeth, New Jersey 07207

SEND ALL REMITTANCES TO:
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114

INVOICE

SEND ALL
REMITTANCES TO
1579 EAST 21st STREET
TULSA, OKLAHOMA 74114

OUR INVOICE NUMBER

31-14-129

DESCRIPTION

AMOUNT

Materials

\$ 1,802.50

Exhibit B

STATE OF CALIFORNIA)
 (SS.
COUNTY OF LAKE)

AFFIDAVIT

Thomas A. Evans, being first duly sworn, states as follows:

1. My current mailing address is P.O. Box 1147, Clearlake Oaks, CA 95423.
2. I was employed by The Dow Chemical Company working at their Carteret, New Jersey antifreeze packaging facility from approximately mid 1974 until the facility closed in the early 1980s. Beginning in early 1976, and continuing thereafter until the facility closed, I acted as the superintendent in charge of the antifreeze operations. In this capacity, I was knowledgeable about all aspects of the antifreeze packaging operations, including generation and disposal of wastes from the operations.
3. To the best of my recollection, the only waste stream generated as a result of the Carteret facilities' antifreeze operations was rainwater which collected in the diked area surrounding storage tanks for Dow's antifreeze product ("DOWGARD[™]") and which potentially could have been slightly contaminated with DOWGARD.
4. To the best of my recollection, at the time that I became the superintendent of the antifreeze packaging operations, and for less than one year thereafter, this rainwater was being shipped for treatment and/or disposal to a facility located in Newark, New Jersey, which I personally visited on at least one occasion.

5. The statements contained in this Affidavit are based upon my own personal knowledge. If called as a witness, I will be able to testify as to the factual statements contained therein.

Further affiant saith not.


Thomas A. Evans

Subscribed to me this 3rd day of October, 1995


Notary Public

